

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS


UNITED STATES OF AMERICA)
)
 vs.) NO. 04-656-MAP
)
 MICHAEL CROOKER)

MOTION TO ENLARGE TIME FOR FILING OF MOTION TO SUPPRESS

Now comes the defendant in the above entitled matter and moves this Honorable Court for an extension of time for the filing of his Motion to Suppress until July 11, 2005 and asserts as his basis, therefore, counsel's computer system has temporarily led to a substantial loss of defendant's motion and brief which requires additional time to recreate.

Counsel for the defendant has conferred with Assistant United States Attorney, Ariane Vuono, Esq., who expresses no objection to the allowance of this motion.


THE DEFENDANT

BY: 

Vincent A. Bongiorno, Esq.
95 State Street, Suite 309
Springfield, MA. 01103
(413) 732-0222
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing to Assistant United States Attorney, Ariane Vuono, Esq., United States District Court, 1550 Main Street, Springfield, Ma. 01103 this 5th day of July, 2005.



Vincent A. Bongiorno